

EXHIBIT 17

Angela Russell, et al.
v.
Management & Training Corporation, et al.

Angela Russell
June 13, 2023

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ANGELA RUSSELL, AS ADMINISTRATRIX
OF THE ESTATE OF JEREMY T. RUSSELL
AND ON BEHALF OF THE WRONGFUL DEATH
BENEFICIARIES OF JEREMY T. RUSSELL

vs. CAUSE NO. 3:22-CV-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION;
JOHN AND JANE DOE CORRECTIONAL OFFICERS;
VITALCORE HEALTH STRATEGIES, LLC; EVELYN DUNN;
STACEY KITCHENS; WILLIAM BRAZIER, AND
JOHN AND JANE DOE MEDICAL PROVIDERS DEFENDANTS

DEPOSITION OF ANGELA DENISE RUSSELL

APPEARANCES NOTED HEREIN

TAKEN AT THE INSTANCE OF: DEFENDANTS
LOCATION: ADAMS & REESE
1018 HIGHLAND COLONY PARK, SUITE 800
RIDGELEY, MISSISSIPPI
DATE: TUESDAY, JUNE 13, 2023
TIME: 10:00 A.M.

REPORTED BY: KELLYE S. SHOWS, CSR #1290

1 A P P E A R A N C E S
23 MR. GRAFTON BRAGG
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25 CORPORATION; JOHN AND JANE DOE
CORRECTIONAL OFFICERS

1 to the hospital they didn't find any drugs in him.

2 Now, I don't know if it's true or not, but that's
3 what they said.

4 Q. Do you know who on the zone had illegal
5 narcotics?

6 A. No. They didn't tell me that.

7 Q. Okay. Are you contending that MTC gave
8 Jeremy Russell access to the illegal narcotics?

9 MR. BRAGG: Objection. You can answer.

10 A. No. I'm not contending that. I don't
11 -- no, I don't think an officer did it.

12 BY MR. YOUNG:

13 Q. Okay. Who do you think gave him access
14 to illegal narcotics?

15 MR. BRAGG: Objection. You can answer.

16 A. Well, an offender. Or I don't know or
17 somebody who has access to bring them in.

18 BY MR. YOUNG:

19 Q. It could have been a visitor. Right?

20 MR. BRAGG: Objection. Can I get a
21 continuing objection to she doesn't have personal
22 knowledge about this?

23 MR. YOUNG: Sure.

24 MR. BRAGG: Okay.

25 A. Yeah. Well, I don't have -- that's right.